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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE TFT-LCD (FLAT PANEL)ANTITRUST LITIGATION	MDL No. M:07-cv-01827 SI
	Case No. 07-cv-2796 SI
	CLASS ACTION
EMW, Inc. v. LG Philips LCD CO., LTD et al. Case No. C-07-2796 SI	DECLARATION IN SUPPORT OFMOTION FOR ORDER SHORTENING TIME
THIS DOCUMENT RELATES TO	Date: July 10, 2007 Time: 10:00 a.m.
ALL INDIRECT PURCHASER ACTIONS	Hon. Susan Illston Courtroom: 10

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DEC. WINTERS IN SUPPORT OF MOTION TO APPOINT INTERIM CLASS COUNSEL FOR THE
CALIFORNIA INDIRECT PURCHASERS SUBGROUP

I, Lingel H. Winters, declare as follows:

1. I am an attorney duly licensed to practice law by the State of California and admitted to practice before this Court. I am principal and owner of the law firm of Lingel H. Winters P.C. and my firm along with my co-counsel Thomas V. Girardi of the law firm of Girardi & Keese serve as attorney of record for plaintiff EMW, Inc. The matters set forth herein are within my personal knowledge, and if called upon and sworn as a witness I could competently testify regarding them. I make this declaration pursuant to 28 U.S.C. sec. 1746.

2. On April 17, 2007, the Panel on Multi-District Litigation transferred MDL Docket No. 1827 *In Re TFT-LCD (Flat Panel) Antitrust Litigation* to the Northern District of California and assigned to the Honorable Susan Y. Illston. In its order, the MDL Panel stated: "We conclude that the Northern District of California is an appropriate transferee forum in this docket because over 50 of the actions of which the Panel has been notified have been brought in that district…"

3. On May 30, 2007 Lingel H. Winters P.C. filed the related case of *EMW, Inc. on behalf of itself and all others s imilarly situated v. LG. Philips LCD CO., LTD et al.* Case No. C-07-2796 SI in the Northern District of California alleging conspiracies to restrain trade in the market for TFT-LCD products.

4. On June 4, 2007 plaintiff filed its Reply Memorandum Indirect Purchaser Leadership Proposal of Lingel H. Winters P.C., in the belief that the June 8, 2007 hearing date for motions was firm.

5. On June 5, this Court continued all pending motions herein to July 10, 2007

6. On June 7, 2007 Lingel H. Winters P.C. filed an Administrative Motion to Consider Whether Cases Should Be Related.

DEC. WINTERS IN SUPPORT OF MOTION TO APPOINT INTERIM CLASS COUNSEL FOR THE CALIFORNIA INDIRECT PURCHASERS SUBGROUP

7. and found and calculated a combined population for the Repealer States of 58,041,000.

    By contrast, said reference book stated that the population of the State of California was

    31,431,000 persons.or 35% of the total Repealer state populations are in California

8. On June 19, 2007, Thomas V. Girardi, Esq. of Girardi & Keese agreed to join Lingel H. Winters P.C. as co-counsel representing EMW, Inc. and the putative class of California Indirect Purchasers of TFT-LCD.

9. Lingel H. Winters P.C. was a member of the Executive Committee in *In Re Microsoft* J.C.C.P. No. 4106, 143 Cal. App. 4th 706 which resulted in a settlement for California indirect Purchasers valued at $1.1 Billion, 2/3 of the unclaimed portions of which were set aside for underprivileged California schools.

10. I have diligently sought to place before the Court plaintiff's Motions, and to streamline the Court's case management with an eye to judicial economy.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed June 21, 2007 in San Francisco, California.

/s/ *Lingel H. Winters*

Lingel H. Winters

DEC. WINTERS IN SUPPORT OF MOTION TO APPOINT INTERIM CLASS COUNSEL FOR THE
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